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October 27, 2006

Via U.S. Mail

Ms. Gail Winkler
United States Probation Officer
United States District Court
Post Office Box 61207
Houston, TX 77208

**UNITED STATES COURTS
SOUTHERN DISTRICT OF TEXAS
FILED**

OCT 31 2006

MICHAEL N. MILBY, CLERK OF COURT

Re: *Richard A. Causey's Response to the Initial Presentence Investigation Report, U.S. v. Causey, H-04-25 (Lake, J.)*

Dear Ms. Winkler:

I am writing in response to the initial Presentence Investigation Report ("PSR") that you prepared for the Honorable Sim Lake, United States District Judge, in anticipation of Richard A. Causey's sentencing in the above-referenced matter. Criminal Local Rule 32.6 affords Mr. Causey the opportunity to object and propose changes to the facts of the offense as reported in the PSR as well as to the interpretation and application of the sentencing guidelines.

The bulk of the PSR is devoted to the Offense Conduct section, which details the Enron Task Force's overarching case against Enron's former executives and goes well beyond the crime to which Mr. Causey pleaded guilty. For this reason, we request that you replace this

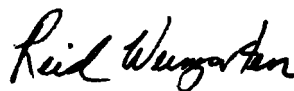
Ms. Gail Winkler
October 27, 2006
Page 2

section with the facts contained in Exhibit A to Mr. Causey's plea agreement, which contains the factual basis for Mr. Causey's guilty plea.

To the extent that you decide to include the Offense Section to the PSR as currently drafted, we do not formally object or otherwise propose changes for the following reasons. First, an informed analysis of the conduct discussed in the PSR is not possible because most of the factual assertions are based on information to which Mr. Causey does not have access, including your office's discussions with government attorneys and FBI agents, trial transcripts, and memoranda of government interviews with various witnesses. Second, Mr. Causey has accepted responsibility for his conduct, pleaded guilty to one count of securities fraud and admitted to the facts contained in his Rule 11(c) plea agreement. According to his plea agreement, Mr. Causey and the Task Force have agreed to recommend that the Court sentence Mr. Causey to a term of imprisonment of between 60 and 84 months. Thus, we believe that the facts to which Mr. Causey has already admitted and the parties' sentencing recommendation establish a sufficient basis upon which the Court can properly determine Mr. Causey's sentence.

Please do not hesitate to contact me if you have any questions concerning this matter.


Sincerely,


Reid H. Weingarten *by David H. Weingarten*

cc: Sean Berkowitz – Enron Task Force
Kathryn Ruemmler -- Enron Task Force

CERTIFICATE OF SERVICE

This is to verify that a true and correct copy of Richard A. Causey's Response to the Initial Presentence Investigation Report has been served on this 27th day of October, 2006, on counsel listed below.



David M. Fragale

Sean Berkowitz
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DOJ Criminal Division
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